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Filing date: **06/28/2013**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92056761
Party	Plaintiff Honda Motor Co., Ltd.
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Submission	Motion for Default Judgment
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

HONDA MOTOR CO., LTD.,)	
)	
Petitioner,)	Cancellation No. 92/056,761
)	Registration No. 3,203,425
v.)	
)	MOTION FOR DEFAULT
Pioneer Motors USA, L.L.C.)	JUDGMENT FOR FAILURE
)	TO ANSWER
Registrant.)	
)	

Petitioner Honda Motor Co., Ltd. ("Honda") respectfully requests that the Trademark Trial and Appeal Board (the "Board") enter a Judgment of Default against Registrant Pioneer Motors USA, L.L.C. pursuant to Rule 55(a) of the Federal Rules of Civil Procedure ("FRCP 55(a)") and Rule 2.106(a) of the Trademark Rules of Practice ("TMRP 2.106(a)") on the grounds that Registrant has failed to file an Answer or enter an appearance in this matter.

1. According to FRCP 55(a), "when a party against whom judgment for affirmative relief is sought has failed to plead or otherwise defend as provided by the rules and the fact is made to appear by affidavit or otherwise, the clerk shall enter the party's default."

2. Honda filed a Petition for Cancellation on February 5, 2013, and pursuant to the Correction to the Board's Order mailed March 22, 2013, the final deadline to file an Answer to the Petition for Cancellation was April 18, 2013. Applicant did not submit an Answer.

3. The Notice of the Petition to Cancel was returned to the Board as undeliverable. The Board then developed an additional address for the Registrant and sent the Notice of the

Petition for Cancellation to the Registrant at that address. That mailing was also returned as undeliverable.

4. On April 24, 2013, the Board suspended the proceeding to give notice to the Registrant via publication.

5. The Notice of the Petition to Cancel was published in the Official Gazette on May 21, 2013.

6. The Answer to the Petition to Cancel was due on June 21, 2013. To date, Registrant has not filed an Answer.

7. Having failed to file a timely Answer or enter an appearance within thirty days of the publication date of May 21, 2013, Applicant has conceded the truth of the claims made in the Petition for Cancellation. Therefore, pursuant to FRCP 55(a) and TMRP 2.106(a), Honda respectfully requests that the Board enter a Judgment by Default against Registrant.

Dated: June 28, 2013
New York, New York

Respectfully submitted,

PRYOR CASHMAN LLP

By: 
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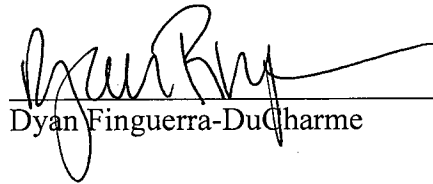
Attorneys for Opposer Honda Motor Co., Ltd.

Certificate of Service

A true and correct copy of the Motion for Default Judgment was sent to the Registrant at the following addresses by First Class Mail on June 28, 2013:

Pioneer Motors USA LLC
State Capitol
Little Rock, AR 72201

Pioneer Motors USA LLC
108 Waterview Dr.
Hot Springs, AR 71913


Dyan Finguerra-DuCharme